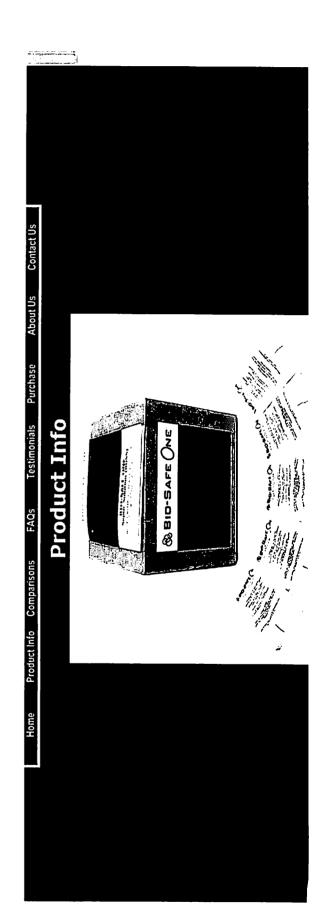




ONT-MAX is Environmentally Safe - Will not harm Humans, Pet's or Plumbing OCIean Clogged Drainfield, clogged Septic, Pipes and Eliminate Odors Obigests up to 100 lbs. of compacted sewage within a 24 hour period OPennies Per Day can Save you Tens of Thousands in Costly Repairs OCommercial Grade NT-MAX Liquefies Bio-Mat and Solids OHighly resistant to soaps, paints, bleach and cleaners **9900 Billion Bacteria Thrive in extreme temperatures.** OPrevent Costly Repairs and Eliminate Pump-Outs ©100% Natural Formula

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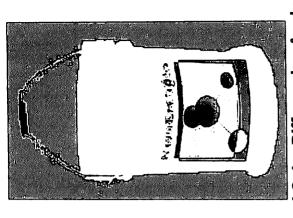


▶ All Products

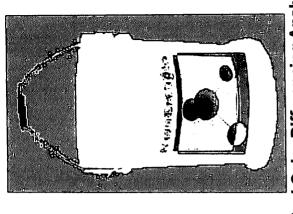
Clogging Your Septic System.

earth. green

Both Images Overlayed (White areas are identical



Pixel Color Differencing Analysis Colored areas are different)



Mowroahblo

Bucket Image NewTechBio



http://newtechbio.com/images/ntliquid.gif

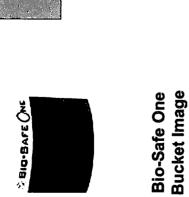
http://www.biosafeone.com



NewToches

Overlay New Label Step 3:





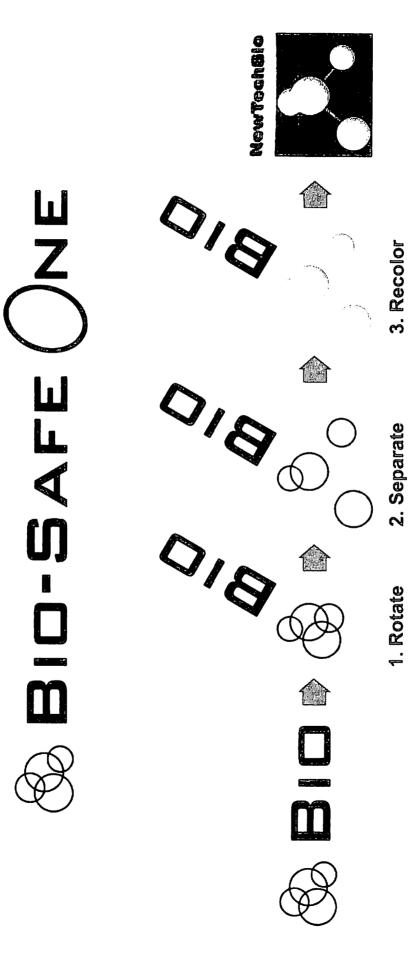
BIO-SAFE ONE



Remove Handle

Step 1:

Manipulate Lid Downward Step 2:



UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

BIOSAFE-ONE, INC., d/b/a WWW.BIOSAFEONE.COM and CHRISTOPHER JORGENSEN.

Plaintiffs.

- against -

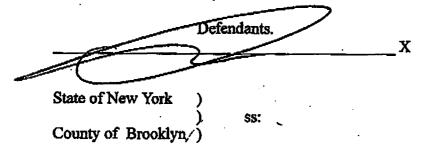
Case No.: 07-CV-6764

AFFIDAVIT OF LOUIS

FLANIGAN

Page 8 of 48

ROBERT HAWS; BRAD SKIERKOWSKI; NEWTECHBIO, USA a/k/a BRAD & COMPANY, INC., d/b/a WWW.NEWTECHBIO.COM; WWW.JUMBOMORTGAGES101.COM a/k/a JUMBOMORTGAGES.NET; and BCI FUNDING GROUP.



LOUIS FLANIGAN, being duly sworn, deposes and says:

- 1. I reside in Brooklyn, New York.
- 2. I am a graphic designer with extensive professional graphic design experience. I have been a graphic designer since [year].
- 4. In or about July, 2002, Christopher Jorgensen hired me to create, as a work made for hire, a graphic design of a septic tank, drainfield and other elements.
- 5. At that time, Christopher Jorgensen provided me with a general sketch of a septic tank diagram that he informed me he generated by hand.
- 6. Christopher Jorgensen and I had numerous conversations about the septic tank diagram from July, 2002 to November, 2002. During that time I revised my designs pursuant to those conversations with Christopher Jorgensen.

Page 9 of 48

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6. I created the house and the underground drawings of the septic tank, distribution box and drainfield. I added the colors and contrast. The house which I also created was mistakenly kept in the septic tank diagram even though I had intended to remove it in the final design that I submitted to Christopher Jorgensen. I completed the design of the septic tank and other elements in or about November, 2002.

Document 27

- 5. The design, annexed to this Affidavit as Exhibit 1, featuring a septic tank, drainfield and other design elements, and now appearing on the website, www.biosafeone.com, is the design that is my original creation which I drew from my own inspiration without deriving it from any prior drawing or prior design, other than from the general sketch of a septic tank diagram from Christopher Jorgensen as specified above.
- 6. The septic tank designs in Exhibit 2 annexed to this Affidavit appear to be exact duplicates of the design I had created for Christopher Jorgensen.
- 7. Defendants' septic tank design, compared to plaintiffs' septic tank design, in Exhibit 3 annexed to this Affidavit appears to simply make minor modifications including contrast and color. Defendants repeat the same mistake from my design by including the house.

Louis Flanigan

Sworn to before me on this

day of September, 2007

Notary Publicancy D. Caberto
Notary Public, State Of New York
No. 01CA6165865
Qualified in Queens County
Commission Expires May 14, 20 U

Page 10.0148

EXHIBIT 1

PLAINTIFFS' SEPTIC TANK DESIGN

oxygen surviving) bacteria conveniently freeze- dried on bran. We direct you to flush the contents of one bag down your commode once a month. B.O.S.S aerobic bacteria come to life when they touch water and digest the top layer of the cesspool or septic tank called the "scum" layer (fats, soaps). The more difficult to cultivate anaerobic bacteria in B.O.S.S digest the lower heavier solid or "sludge" layer (see diagram below of a septic system).

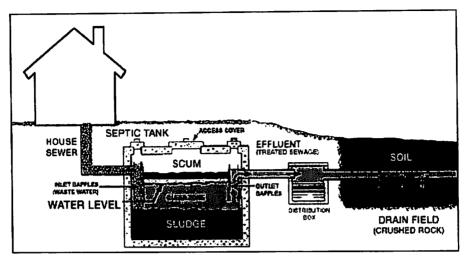


Diagram of a septic system

Sewage digesting bacteria in **B.O.S.S** double every 20 minutes and replenish bacteria in the tank that have been destroyed by everyday use of soaps and cleaners. Through it's superior enzymatic activity against specific substrates such as lipase (grease), protease (protein), cellulase (mold, vegetables and paper) and amylase (starch), **B.O.S.S** digests and dissolves organic matter, breaking down its molecular structure and recycles water, minerals and carbon dioxide back into the environment.

B.O.S.S digests up to 100 pounds of sludge and scum in a 24-hour period. With such a high digestion rate, **B.O.S.S** reduces the depth of sewage in the tank and increases the overall capacit of your tank. This process lowers the pressure in the septic tank which allows proper digestion to take place, making sure that sludge or scum does not flow into the drainfield where it clogs the drainfield pipes ands soil. **B.O.S.S** reduces strain on your whole system, and increases system longevity.

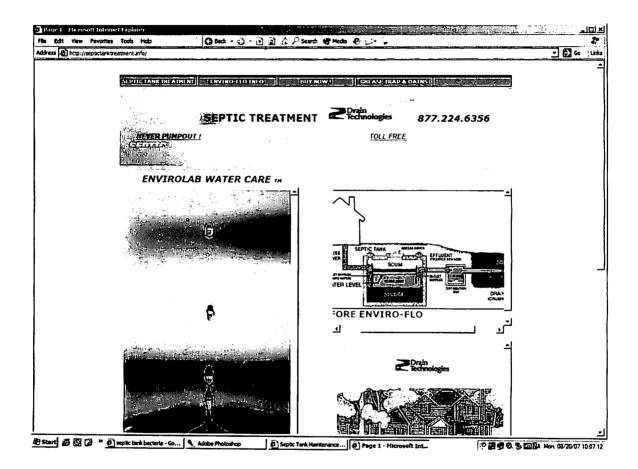
According to the EPA, trouble signs in your system are difficult to detect and if your system is not properly maintained, it will eventually fail. Most systems fail due to problems in the drainfield whe the drain field lines and soil gets clogged with biomat (black tar-like sewage residue) and sewage The sewage water has no place to go. Waste is then forced back into the tank, up through your pipes and into your home! When there is not enough bacteria in the tank, proper digestion can not take place. You need to add bacteria to your system to avoid sewage accumulation in your tank and field.

Additionally, sludge buildup results in loss of $\frac{1}{2}$ " of space every 4 years along the walls of you pipes, limiting the amount and rate of sewage flowing through your system. Using B.O.S.S. on a monthly basis assures that buildup does not occur.

The bacterial cultures introduced by **B.O.S.S** are laboratory produced and tested. We guarantee t be non-disease causing and non-hazardous. The specific types and volume of bacterial strains developed by our laboratories, especially the anaerobic cultures necessary to combat difficult wastes such as grease and paper have been developed over 56 years, the most effective means c dissolving wastes available.

EXHIBIT 2

PLAINTIFFS' SEPTIC TANK DESIGN APPEARING ON OTHER WEBSITES



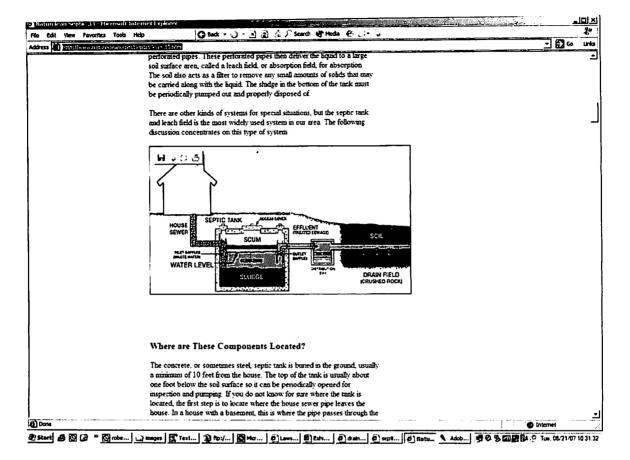
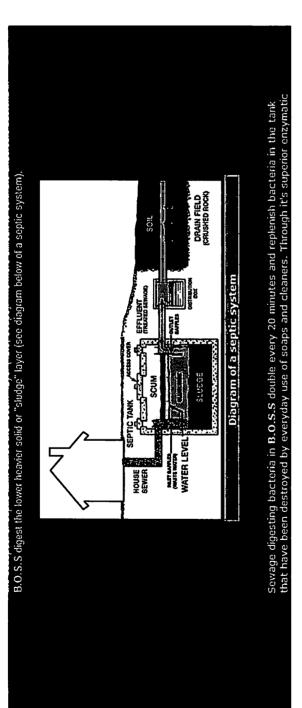


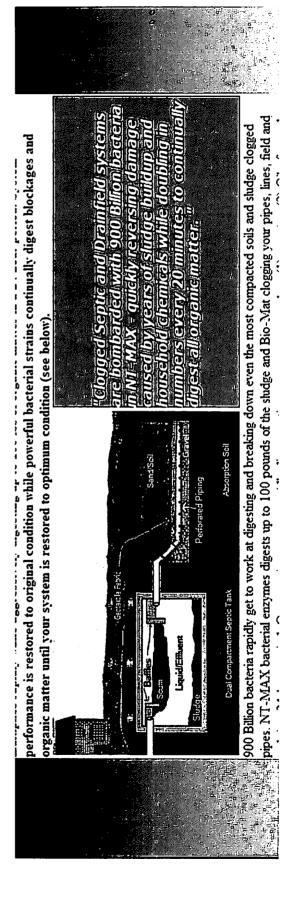
EXHIBIT 3

SEPTIC TANK DESIGNS: COMPARISON OF PLAINTIFFS' AND DEFENDANTS' DESIGNS

biosafeone.com



newtechbio.com



WWW.BIOSAFEONE.COM WEBSITE

PRINTED FROM THE INTERNET ON 8/29/07 AND ON 8/31/07

Document 27

BioSafeOne: Keep Your Septic System Sparkling Clean, Clear, and Free of Contamination! Stronger than Rid-X

8/29/2007



About Us Purchase Competitive Comparison Testimonials FAOs Product Info Comparisons

look at our comparison chart that shows the price, and quantity of direct, an industrial strength product with a proven track record, so you pay wholesale price for a treatment that really works. Take a mark up value) for ineffective products that are too weak to fully digest and eliminate sewage. We ship you manufacturer Other brands charge retail prices (that means 2-3 times the other septic products, and notice the overall value.

End Result Product Comparison	4.5 million times weaker. More expensive. Less effective.	Bio-Sate One saves you the cost of pump-outs and system replacement	Strength: Bacteria counts in the billions per gram.	The shelf life of powder bacteria does not last 6 years.	Excessive amount of bacteria needed suggests that the bacterial count is significantly low.
Experience and Company History	40 Years	Over 53 years Major success: Clean up of 1989 Exxon Valdez Oil Spill	Leading Manufacturer Worldwide.	duc to numerous duc to numerous Attorney General complaints. Product resembles sawdust.	In/out of business.
Money Saved compared to Bio-Safe One	\$112.28	\$175 \$700 (Price Range of Pump-out) or \$5,000	\$20,000 (System Replacement)	None, see Comparison	None, see comparison
3 Year Supply	\$341.28	\$199.00		\$179 for a 6 Vear Supply	\$223.44
Average Price: 1 Month Supply	\$9.48	\$4.38 (See	pelow	\$2.48	\$6.20
Product Name	Rid-X	Bio-Safe One Septic	Solution	Septic Helper	Bio Clean

effective additives Stop paying retail price for weaker less or products!

WE HAVE THE SOLUTION SEPTIC SOLUTION! **BIO-SAFE ONE** (B.O.S.S.)!

system! If you fail to maintain Take charge of your septic costs thousands of dollars system by maintaining it! You need to maintain your your septic system, it can to replace it! BioSafeOne: Keep Your Septic System Sparkling Clean, Clear, and Free of Contamination! Stronger than Rid-X

 NOTE: Calculation for 1 month supply of Bio-Safe is based on free shipping and handling, as well as 6 free months added to every order! These savings include FREE shipping. We send you a 3.5 year supply in one shipment, so you avoid the cost of traveling back and forth to the store, along with the taxes you would have to pay, bringing more value to you, the end user.

To order, Click Here!

The Bio-Safe Safe One Septic Solution has the strongest formula of bacteria and enzymes on the market. Furthermore, B.O.S.S bacteria are non-oxygen surviving, difficult and expensive to produce, which clean the toxic sludge deep inside your septic tank. Bacteria counts in other competitors range in the millions, while our product has 4.5 billion active bacteria per gram. This means that the Bio-Safe One Septic Solution degrades waste faster, and prevents expensive emergencies and unnecessary pumping costs!

To order, Click Here!

Other reasons to buy Bio-Safe One Septic Solution:

- Experience Over 56 years in Commercial and Industrial markets.
- . Wholesale price-direct from the manufacturer
- Guarantee of authenticity of our Industrial strength, laboratory tested, bacteria and enzymes. 4.5 Billion per gram.
 - 24/7 day a week, toll free #,unlimited technical support/customer service to help you with any of your needs.
- Payment Plans available upon request for customers who require more time. (No Credit Check)

Our product originated from commercial use in industries with

8/29/2007

BioSafeOne: Keep Your Septic System Sparkling Clean, Clear, and Free of Contamination! Stronger than Rid-X

and unnecessary pump-outs. Unlike other competitors such as Rid x or Septic Helper, we have a prominent history not based and success in helping with the largest clean-up in America's on commercial advertising. Our product gained its popularity Products like Rid-x: are not lab-cultivated, are "yeast-based" household soaps and cleaners, whereas, Bio-Safe One Septic eliminate tough problems such as backups, overflows, odors bacteria per gram count is millions of times weaker than our much stronger!). Other products can be destroyed by use of Solution is designed to digest and neutralize these common heavy grease use that required a strong enough treatment bacteria, lack essential other neutralizing ingredients; the compared with our product which has billions per gram product (which is as they advertise "in the millions" as that could clean out grease traps, septic systems and history, the enormous Exxon Valdez oil spill in 1989. household additives,

esser supply (they want you to keep coming back to the store In addition to this, you as a customer will be saving over 50% with Rid-x or septic helper, you must pay the retail price for a in price by buying direct from us the manufacturer whereas every month!).

unnecessary pumping costs! Bio-Safe One Septic Solution: The Bio-Safe One Septic Solution degrades waste faster, prevents expensive emergencies, and prevents having to pay for solution to all of your septic needs!

To order, Click Here!

ORDER BIO-SAFE ONE ONLINE TODAY GOT A QUESTION OR GOMMENT CLICK HERE TO

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OMECK BY PHONE OR ONLINE CHECK

call 1-866-424-6663

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8/29/2007

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NT-MAX is the Strongest Commercial Grade Clogged Septic and Clogged Drainfield Product Available on the Market Today!

No other Product Comes Close - NT-MAX Contains over 900 Billion Bacteria Per Liquid Gallon and 5 Billion Per Powder Gram. NT-MAX has the Power and Strength to Completely Restore Your Clogged Septic and Drainfield System to Like New Condition.

NT-MAX is a powerful commercial grade product developed to aggressively digest sludge, fats, grease, oils and all organic matter as rapidly as possible to potentially save you tens of thousands of dollars in repair or replacement costs. While other products may be "stopped in their tracks" by common household cleaners, NT-MAX can neutralize soaps and

detergents to continue degrading waste faster!

industrial Strength
Septic Treatment.
Restore Clogged
Septic and
Drainfield Systems
and Eliminate
Pump-Outs

Click Here to
Order NOW



NT-MAX vs. the Competition

Oreen earth Ambana Insalva.

Otherwise 100%, Socure

	Years in Business	24 Hour Customer Service	900 Billion Bacterial Count Per Liquid Gal	5 Billion Bacterial Count Per Gram	Return Policy	Safe for the Environment Will NOT Harm Humans	Monthly Cost Conclusion
NT-MAX	70 +	0	0	0	•	0	36.31 Per Month Liquid Highest Bacterial Count Superior Product
Rex-Bac-T	24	No	No	No	0	•	\$98.00 More for the same Liquid Bacterial Count
Septic Remedy		No	None	4 Bili Gram	No		Website Vague, unknown. Many 888 complaints.
Roto Rooter	70+	No	?	3 Bill Gram	()	③	Inferior Bacterial Count
Roebie K-37	70+	7	450 Mill	450 Mill	6	•	Inferior Bacterial Count
ZEP/Enforcer	70+	No	None	700 Mill	?	0	Inferior Bacterial Count
RID-X	100+	?	Millions per Gal	1.5 MIII Per gram	7	6	Inferior Bacterial Count
Drano	100+	No	None	None	?	Hazardous	Hazard rating of "high" Can cause severe intestina damage if swallowed

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Oppyright 2007 NewTechBio NT-MAX Septic Tank Treatment USA All Rights Reserved NewTechBio USA provides the most powerful clogged septic leaning enzyme and bacterial septic treatments on the market in a powder or liquid form. Clogged septic systems and clogged drainfields can cost tens of thousands of dollars to replace. NT-MAX septic treatment contains 900 billion bacteria per gallon and can completely restore your clogged septic and clogged drainfield to full functionality. *simulations reflect potential of NT-MAX septic tank treatment*Free shipping on item #680 and #708 only excluding Alaska, Puerto Rico, Hawaii and International orders. Other septic treatments may exclude shipping.

WWW.CLOGGEDDRAINFIELD.COM WEBSITE PRINTED FROM THE INTERNET ON 8/26/07

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Pump-Outs. Septic and Weaker, Less Effective Brands Cost up to 400% More While Offering Inferior Results. NT-MAX Contains over 900 Billion Bacteria Per Liquid Gallon and 5 Billion Per Powder Gram.

Drainfield, Systems Septic Treatment. Restore Cloqued and Eliminate



NT-MAX has the Power and Strength to Completely Restore

Your Clogged Septic and Drainfield System to Like New

Condition.

All Products Contact Us About Us

dollars in repair or replacement costs. While other products NT-MAX is a powerful commercial grade product developed to digest sludge, fats, grease and organic matter as rapidly as possible to potentially save you tens of thousands of may be "stopped in their tracks" by common household

FREE FEOLEX cleaners, NT-MAX can neutralize soaps and detergents to

NT-MAX vs. the Competition

continue degrading waste faster!



8/26/2007

Filed 09/27/2007

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Page 2 of 2

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Safe for the Environment Will NOT Harm Humans	•	9		3		•		Hazardous
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5 Billion Bacterial Count Per Gram		o Z	4 Bill Gram	3 Bill Gram	450 Mill	700 Mill	1.5 Mill Per gram	None
900 Billion Bacterial Count Per Liquid Gal		SZ.	None	ċ	450 Adil	None	Millions per Gal	None
24 Hour Customer Service	9	°Z	0	N _O	7	° Z	2	o Z
Years in Business	t	24	6	70+	70+		100+	100+
	NT-WAX 70+	Rex-Bac-T	Septic Remedy	ā	Roebic K-37	ZEP/Enforcer	RID-X	Drano

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cleaning enzyme and bacterial septic treatments on the market in a powder or liquid form. Clogged septic systems and clogged drainfields can cost tens of thousands of dollars to replace. NT-MAX septic treatment contains 900 billion bacteria per gallon and can completely restore your clogged septic and clogged drainfield to full functionality. *simulations reflect potential of NT-MAX septic tank treatment*Free shipping on Item #680 and #708 only excluding Alaska, Puerto Rico, Hawaii and International orders. Other septic treatments may exclude shipping. © Copyright 2007 NT-MAX Bio NT-MAX Septic Tank Treatment USA All Rights Reserved NT-MAX Bio USA provides the most powerful clogged septic

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Available on the Market Today!

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Restore Clagged Septic and **Drainfield** Systems and Eliminate Pump-Industrial Strength **Outs**,





NT-MAX has the Power and Strength to Completely Restore Your

Clogged Septic and Drainfield System to Like New Condition.

Billion Bacteria Per Liquid Gallon and 5 Billion Per Powder Gram.

No other Product Comes Close - NT-MAX Contains over 900

dollars in repair or replacement costs. While other products may be aggressively digest sludge, fats, grease, oils and all organic matter "stopped in their tracks" by common household cleaners, NT-MAX can neutralize soaps and detergents to continue degrading waste as rapidly as possible to potentially save you tens of thousands of NT-MAX is a powerful commercial grade product developed to

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Compare NT-MAX clogged septic treatment to other inferior brands.

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9/10/2007

Safe for the Environment Monthly Cost Will NOT Conclusion Harm Humans	\$6.31 Per Month Liquid Highest Bacterial Count Superior Product	\$98.00 More for the same Liquid Bacterial Count	Website Vague, unknown. Mary 888 complaints.	Inferior Bacterial Count	(A) Inferior Bacterial Count	Inferior Bacterial Count	(a) Inferior Bacterial Count	Hazardous Can cause severe intestinal
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5 Billion Bacterial Count Per Gram	9	0 N	4 Bill Gram	3 Bill Gram	450 Mill	700 Mill	1.5 Mill Per gram	None
900 Billion Bacterial Count Per Liquid Gal	9	Ŷ.	None	Ċ	450 Mill	None	Millions per Gal	None
24 Hour Customer Service	•	Ŷ	No.	Š		0 2	ċ	°Z
Years in Business	70 +	24	Č	70÷	704	70+	100•	100+
	NT-MAX	Rex-Bac-T	Septic Remedy	Roto Rooter	Roebic K-37	ZEP/Enforcer	X-C	Drano

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Case 1:07-cv-06764-DC Document 27 Filed 09/27/2007 Page 32 of 48

ODETTE J. WILKENS

ATTORNEY-AT-LAW
67-30 DARTMOUTH STREET, SUITE 7M
FOREST HILLS, NEW YORK 11375
718.575.8784
OWILKENS@NYC.RR.COM

August 21, 2007

VIA FEDERAL EXPRESS

VIA EMAIL: abuse@lunarpages.com VIA FACSIMILE: 714.521.8195

Mr. Chad Riddle Corporate Secretary Add2Net, Inc. 100 E. La Habra Boulevard La Habra, CA 90631

RE: NOTICE OF COPYRIGHT INFRINGEMENT

Dear Mr. Riddle:

I represent Bio-Safe One, Inc. (the "Owner"). This is to notify you and Lunar Pages as required under Sections 512(c)(3) and 512(d)(3) of the Digital Millennium Copyright Act (17 U.S.C. §§512(c)(3) and 512(d)(3)) that:

- The Owner is the exclusive copyright owner of the "biosafeone.com" website (the "Bio-Safe One Website"); and
- The website currently known as "newtechbio.com" has infringed on the Owner's exclusive copyright by having created and distributed unauthorized copies and unauthorized derivative works of the Bio-Safe One Website (the present website "newtechbio.com" being the progeny directly derived from this infringement); and
- The Owner has commenced a lawsuit in federal district court in the Southern District of New York seeking a permanent injunction against the following defendants from operating the Infringing Website and infringing on the Owner's copyright, among other things (the "Infringing Website" means the website currently known as "newtechbio.com"): Robert Hawks, Brad Skierkowski, Newtechbio, USA a/k/a Brad & Company, Inc. d/b/a www.newtechbio.com, www.jumbomortgages101.com a/k/a Jumbomortgages.net, and BCI Funding Group (see http://dockets.justia.com/docket/court-nysdce/case no-1:2007cv06764/case_id-310637/).

Pursuant to 17 U.S.C. §512(d)(3), please promptly remove or disable all access to the Infringing Website, including without limitation, all webpages and references to the Infringing Website.

I have a good faith belief that the use of the Infringing Website is not authorized by the Owner, its agents or the law. The information in this Notice of Copyright Infringement is accurate, and under penalty of perjury I am authorized to act on behalf of the Owner.

If you need any further information, please contact me.

Sincerely,

/s/ Odette J. Wilkens

cc: Bio-Safe One, Inc.

ODETTE J. WILKENS

ATTORNEY-AT-LAW
67-30 DARTMOUTH STREET, SUITE 7M
FOREST HILLS, NEW YORK 11375
718.575.8784
OWILKENS@NYC.RR.COM

August 26, 2007

VIA CERTIFIED MAIL
VIA EMAIL: copyrightclaims@godaddy.com
VIA FACSIMILE: 480.505.8844

Godaddy.com Mr. Ben Butler Copyright Department 14455 N. Hayden Road Suite 219 Scottsdale, AZ 85260

RE: NOTICE OF COPYRIGHT INFRINGEMENT

Dear Mr. Butler:

I represent Bio-Safe One, Inc. (the "Owner"). This is to notify you as required under Sections 512(c)(3) and 512(d)(3) of the Digital Millennium Copyright Act (17 U.S.C. §§512(c)(3) and 512(d)(3)) that:

- The Owner is the exclusive copyright owner of the "biosafeone.com" website (the "Bio-Safe One Website"); and
- The website currently known as "cloggeddrainfield.com" has infringed on the Owner's exclusive copyright by having created and distributed unauthorized copies and unauthorized derivative works of the Bio-Safe One Website (the present website "cloggeddrainfield.com" being the progeny directly derived from this infringement); and
- The Owner has commenced a lawsuit in federal district court in the Southern District of New York seeking a permanent injunction against the following defendants from operating the Infringing Website and infringing on the Owner's copyright, among other things (the "Infringing Website" means the website currently known as "cloggeddrainfield.com"): Robert Hawks, Brad Skierkowski, Newtechbio, USA a/k/a Brad & Company, Inc. d/b/a www.newtechbio.com, www.jumbomortgages101.com a/k/a Jumbomortgages.net, and BCI Funding Group (see http://dockets.justia.com/docket/court-nysdce/case no-1:2007cv06764/case id-310637/).

Pursuant to 17 U.S.C. §512(d)(3), please promptly remove or disable all access to the Infringing Website, including without limitation, all webpages and references to the Infringing Website.

I have a good faith belief that the use of the Infringing Website is not authorized by the Owner, its agents or the law. The information in this Notice of Copyright Infringement is accurate, and under penalty of perjury I am authorized to act on behalf of the Owner.

If you need any further information, please contact me.

Sincerely,

/s/

Odette J. Wilkens

cc: Bio-Safe One, Inc.

EXHIBIT P

CHAPMAN, GLUCKSMAN & DEAN

ATTORNEYS AT LAW
11900 WEST OLYMPIC BOULEVARD
EIGHTH FLOOR
LOS ANGELES, CALIFORNIA 90064-0704
www.cgdlaw.com

TELEPHONE: (310) 207-7722

FACSIMILE: (310) 207-6550

JEFFREY A. COHEN CHAIR, INTERNET & TECHNOLOGY

EMAIL: jcohen@cgdlaw.com

August 28, 2007

Arthur L. Lessler 540 Old Bridge Turnpike South River, New Jersey 08882 Via Facsimile (732) 254-5155

Re:

DMCA Infringement Notice

Domain Name:

<www.newtechbio.com>

Our File Number:

7017.001

Dear Mr. Lessler:

Please be advised that this office represents the interests of Add2Net, Inc. dba Lunarpages with respect to the above referenced matter. We ask that you kindly direct all further communications regarding this matter directly to this office.

We are in receipt of your letter to our client dated August 27, 2007. This shall respond thereto.

As you are aware, our client was provided with a properly formatted Digital Millennium Copyright Act (the "Act") notice pursuant to 18 U.S.C. §512(c)(3). Our client responded by expeditiously moving to remove, or disable access to, the material that was claimed to be infringing.

Your client then provided this office with a counter-notice under 18 U.S.C. §512 (g)(2)(B). However, this notice was deficient in that it did not contain the required elements to be effective.

Furthermore, our client has been notified of the existence of a lawsuit dealing with the issues presented in the original notice. Therefore, at this time even if our client were to receive a properly formatted counter-notice under the Act, our client would be prevented from taking any further action regarding access to the subject website absent a specific court order directing our client's actions.

Your letter indicates that the court in your case refused an initial injunction. This is insufficient, however, for our client to take any action under the act because the site

Arthur L. Lessler August 28, 2007 Page 2 of 2

was disabled pursuant to our client's obligations under the Act. If you should secure an order from the court directing our client to re-activate the site our client will comply in that regard. Under no circumstances will our client become involved in editing the site or making any judgment as to whether your client has done so sufficiently. Such an order should be drafted specifically ordering our client to reactivate the site. You may provide such order directly to this office.

Once you secure a proper order from the court we will endeavor to comply expeditiously. We trust that this fully addresses your concerns.

Very Truly Yours,

CHAPMAN, GLUCKSMAN & DEAN A Professional Corporation

JEFFREY A. COHEN

JAC:kw L-Lessler.doc Case 1:07-cv-06764-DC Document 27 Filed 09/27/2007 Page 38 of 48

EXHIBIT 14

From: Lessler@Compuserve.com

Subject: Biosafe-One, Inc. et. al. v. Hawks et al. - USDC-NY Case No. 07-6764

Date: August 27, 2007 5:09:47 PM EDT

To: OWilkens@nyc.rr.com Cc: vik@pawarlaw.com

Dear Ms. Wilkens:

Last night you sent a DMCA notice letter to hosting company godaddy.com which falsely states that my client's website cloggeddrainfield.com "has infringed on the Owner's exclusive copyright by having created and distributed unauthorized copies and unauthorized derivative works of the Bio-Safe One Website".

Unless within 24 hours you either (1) point out to me exactly what significant text or graphics on the cloggeddrainfield.com website is a copy of what protected material on the Biosafe-One website or (2) withdraw your DMCA notice letter, I will file a third party complaint against you in the aforementioned action for damages and injunctive relief for intentional interference with my client's contract rights and intentional interference with their prospective economic advantage.

Arthur L. Lessler Lessler & Lessler 540 Old Bridge Turnpike South River, NJ 08882 Tel (732) 254-5155 Fax (732) 254-7630 REPLY TO: Lessler@Compuserve.com

CONFIDENTIALITY NOTICE:

This e-mail is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged and confidential. If you have received this communication in error, please do not read or distribute it and please notify the sender immediately by e-mail or by telephone at (732) 254-5155 and delete the original message.

Thank you.

ODETTE J. WILKENS
ATTORNEY-AT-LAW
67-30 DARTMOUTH STREET, SUITE 7M
FOREST HILLS, NEW YORK 11375
718.575.8784
OWILKENS@NYC.RR.COM

September 5, 2007

By Mail
By Email: Lessler@Compuserve.com

Arthur L. Lessler, Esq. Lessler & Lessler 540 Old Bridge Turnpike South River, NJ 08882

Re: Biosafe-One, Inc. et. al. v. Hawks et al. - USDC-NY Case No. 07-6764

Dear Mr. Lessler:

I have received your intemperate email dated August 27, 2007.

Dealing with the substance of your email first, the www.cloggeddrainfield.com website is substantially similar to www.newtechbio.com website, save for the name of the website, the substitution of "NT-Max" for "NewTech" and other minor modifications. While either website continues to infringe on my client's exclusive copyright to the "biosafeone.com" website, the Digital Millenium Copyright Act ("DMCA") provides appropriate safeguards, of which my client has availed itself, unless the court orders otherwise.

Information regarding the copies and derivative works created by your clients in violation of my client's copyright in the "biosafeone.com" website will be provided and is forthcoming.

The balance of your email is a transparent effort to deprive my clients of their choice of counsel by creating a fictitious conflict of interest, and to personalize the disputes between our respective clients. Insofar as you or your clients are attempting or intending to interfere with the defense of this case, as well as my client's rights under the DMCA, Rule 11 sanctions will be sought.

Very Truly Yours,

Odette J. Wilkens

cc: Christopher Jorgensen,
 Chief Executive Officer of Bio-Safe One, Inc.
 Anthony Wilger, Esq.
 Vik Pawar, Esq.

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EXHIBIT 15

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Document 27

From:

support@lunarpages.com

Subject:

Re: [Lunarpages Helpdesk] [RXHS3552BBWK] copyright concerns

Date:

August 22, 2007 5:30:04 PM EDT

To:

OWILKENS@NYC.RR.COM

Dear owilkens,

---- TECH RESPONSE STARTS HERE ----

Hello.

This will address the latest status of your recent complaint to Lunarpages regarding an alleged copyright infringement. Please recall that Lunarpages has no involvement with or control over the web site or materials in question and we continue to encourage you to contact the owner of the web site directly with regard to your dispute.

Please be advised that we have now received a proper counter claim notice from the operator which also meets the requirements of the Digital Millennium Copyright Act. (DMCA) 17 U.S.C. 512 (c)(3). Under the provisions of that act we are now required to activate the site unless we are provided with notice from you that you have actually filed a lawsuit seeking to enjoin the site operator from infringing the copyright for the material on the site. Upon receiving notice that you have filed such a lawsuit the deactivation will remain in effect until such time as there is a further order from that court requiring otherwise. This will conclude our involvement as there is no other action we are permitted to take.

Included herewith is a full and complete copy of the counter claim notice received from the operator of the web site. Lunarpages takes copyright issues very seriously and has implemented policies and procedures specifically to deal with claims such as yours pursuant to applicable law so as to protect the rights of all parties involved. We have now fully complied with all elements of the act and as such Lunarpages falls within the Safe Harbor Provisions of the DMCA. In doing so we have made no determination as to any validity of your claim or any lack thereof.

"I swear under penalty of perjury, that any potentialy copyright protected material, past or present, on my website located at www.newtechbio.com has been fully removed and any further claims of copyright infirngement which may arise, are completely unjustified and false. I am aware of the federal complaint and am fully in compliance with all copyright aspects of the site. This case is ongoing and is projected to rule in our favor being that any past accidental copyright infirngement has been stricken from the entire domain.

Thank you."

Of course if you should have any further questions, comments or concerns regarding this matter please do not hesitate to let us know.

Document 27

Very truly yours, Lunarpages Legal

Shawn Williams Lunarpages Abuse Department Representative

---- TECH RESPONSE ENDS HERE ----

Additionally, you may also view the entire ticket by visiting: https://support.lunarpages.com/tickets/view/239404

Your ticket ID is 239404.

Lunarpages Webhosting support@lunarpages.com

From:

bradco1@epix.net

Subject:

RE: Digital Millenium Copyright Act - Notice of Copyright

Infringement

Date:

August 27, 2007 5:38:19 PM EDT

To: Cc:

owilkens@nyc.rr.com passman@epix.net

Please see attached:

----Original Message----

From: Odette Wilkens [mailto:owilkens@nyc.rr.com]

Sent: Sunday, August 26, 2007 10:02 PM

To: Ben Butler

Subject: Digital Millenium Copyright Act - Notice of Copyright

Infringement

Dear Mr. Butler:

Please see attached.

Sincerely,

Odette J. Wilkens Attorney-at-Law 67-30 Dartmouth Street Forest Hills, New York 11375 718.575.8784 owilkens@nyc.rr.com

Dear Mr. Ben Butler,

Thank you for contacting me regarding the "copyright infringement claim" against my websites www.cloggeddrainfield.com.

I swear, under penalty of perjury, that any potential copyright protected material, on my website located at www.cloggeddrainfield.com, contains no material within that is alleged to contain copyright infringement by the accuser. Any and all further claims of copyright infringement, which may arise, are completely unjustified and false. I am aware of the federal complaint against www.newtechbio.com only, and am fully in compliance with all copyright aspects of the site. The Federal Honorable Judge Chin ruled against the plaintiff this day at approximately 11:00 a.m. this day August 27, 2007 in our favor against the motion to shut down the web site.

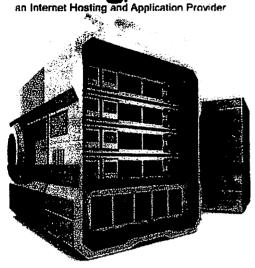
This case is ongoing and is projected to rule completely in our favor being that any past accidental copyright infringement concerning www.newtechbio.com only has been stricken from the entire domain.

Thank you again for the information and please contact me at 570-499-9610 if the contents of this letter do not contain all the required information that www.godaddy.com is requesting in order to unlock the site.

Sincerely,
Bradley Skierkowski
CEO www.cloggeddrainfield.com www.newtechbio.com
102 .N Blakely Street
Dunmore, PA 18512
Phone: 570-499-9610

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EXHIBIT 16



Latest news

14-09-2007

<u>Dedicated servers have been upgraded</u> to offer more than DOUBLE transfer per month!!

13-08-2007

THIRD consecutive year at HostingCon 2007.!

Frequently ask questions

Do you have 24x7 support?

How secure will my online operations be if I choose HostingPanama?

How is HostingPanama different than other hosting providers?

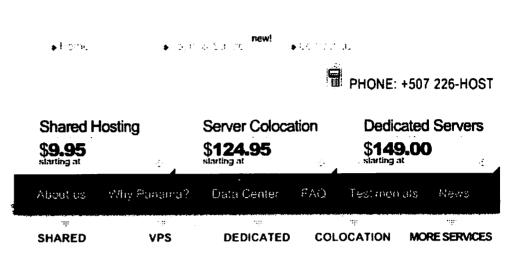
Where is your Data Center located? Is it offshore?

» More FAQs

hostingpanamaTM

Telephone: (507) 226-HOST *
Fax: (507) 226-6567
sales@hosting.com.pa
http://www.hosting.com.pa

Call us: (507) 226-HOST



About hostingpanamaTM

9 years of experience, over 7,000 customers world wide, industry leading infrastructure, and lot's of hard work, have made us into what we are today:

The world's most important and experienced "Offshore hosting" firm.

HostingPanama(TM) is an international, secure and Offshore Hosting provider, with 2 main datacenters located in the Republic of Panama. Our group of companies and franchises world wide have been in business since 1999. We offer 24/7 technical support and a multilingual staff. Throughout these years we have been dedicated to offer cost-effective offshore, private and secure hosting solutions to our customers and have made strong alliances and business partnerships with companies like, Microsoft, SWSOFT, MX Logic, MaLabs, Cable & Wireless, Tucows and several others. With the pass of time, HostingPanama has earned international recognition and has won several Latin American awards.

Among our broad range of products, we cover the main 4 areas of hositng: <u>Shared hosting</u>, <u>Virtual Private Servers</u>, <u>Dedicated servers</u> and <u>Colocation services</u>. We also provide <u>managed services</u>, <u>monitoring</u>, <u>domain name registration and a variety of add-on solutions</u> such as security services and SSL certificates.

Our clients entrust us with their operations, and come from diverse backgrounds, from the USA and Canada to England, Italy, China, the Bahamas, Australia, Germany, Italy, Spain, France and many other countries around the Globe.

If you have any further questions about us, please feel free to **contact us** for more information.

Click here to know why anyone should move its e-commerce activities to Panama.





newtechbio.com

Reserved

[whois.internic.net]

Domain names in the .com and .net domains can now be registered with many different competing registrars. Go to http://www.internic.net for detailed information. Domain Name: NEWTECHBIO.COM

Registrar: TUCOWS INC.

Whois Server: whois.tucows.com

Referral URL: http://domainhelp.opensrs.net

Name Server: NS11.PTYHOST.COM Name Server: NS12.PTYHOST.COM

Status: ok

Updated Date: 29-aug-2007 Creation Date: 23-mar-2007 Expiration Date: 23-mar-2008

NOTICE: The expiration date displayed in this record is the date the registrar's sponsorship of the domain name registration in the registry is currently set to expire. This date does not necessarily reflect the expiration date of the domain name registrant's agreement with the sponsoring registrar. Users may consult the sponsoring registrar's Whois database to view the registrar's reported date of expiration for this registration.